1 2 3	Larry M. Kazanjian, SBN: 071441 Alexandra M. Asterlin, SBN: 221286 PALMER KAZANJIAN WOHL HODSO 2277 Fair Oaks Boulevard, Suite 455 Sacramento, CA 95825 Telephone: (916) 442-3552 Facsimile: (916) 640-1521	N LLP	
5	Attorneys for Defendants		
6	NORTHERN CALIFORNIA TILE AND STONE, INC., a California corporation; ROGER		
7	WAYNE LEASURE III		
8			
9	UNITED STATES DISTRICT COURT		
10	IN THE NORTHERN DISTRICT OF CALIFORNIA		
11	SAN FRANCISCO DIVISION		
12			
13	TRUSTEES of the NORTHERN	Case No. 3:19-cv-00628-JD	
14	CALIFORNIA TILE INDUSTRY PENSION TRUST FUND; TRUSTEES of the NORTHERN CALIFORNIA TILE	STIPULATION AND JOINT	
15	INDUSTRY HEALTH AND WELFARE TRUST FUND; TRUSTEES of the	ADMINISTRATIVE MOTION FOR [proposed] ORDER REVISING PRETRIAL	
16	NORTHERN CALIFORNIA TILE INDUSTRY APPRENTICESHIP AND	SCHEDULE (Local Rules 7-11 and 7-12)	
17	TRAINING TRUST FUND: TRUSTEES of the NORTHERN CALIFORNIA TILE		
18	INDUSTRY VACATION AND HOLIDAY TRUST FUND: and TRUSTEES of the NORTHERN		
19 20	CALIFORNIA TILE INDUSTRY LABOR MANAGEMENT COOPERATION		
	TRUST FUND		
21	Plaintiffs,		
22	v.		
23	NODEWEDNI GALVEDNIA EVEN DANS		
24	NORTHERN CALIFORNIA TILE AND STONE, INC., a California corporation; SALENA ROSE LEASURE; ROGER		
25	WAYNE LEASURE III; and DOES 1-20		
26	Defendants.		
27			
7 X	A Property of the Control of the Con		

PALMER KAZANJIAN WOHL HODSON LLP 2277 Fair Oaks Blvd., Suite 455 Sacramento, CA 95825 916.442.3552

PALMER KAZANJIAN WOHL HODSON LLP 2277 Fair Oaks Blvd., Suite 45 Sacramento, CA 95825 916.442.3552

STIPULATION and JOINT ADMINISTRATIVE MOTION

On October 9, 2019, the Court issued a revised case-management Scheduling Order setting the following dates:

CURRENT SCHEDULE

Event	Deadline
Fact discovery cut-off	April 3, 2020
Expert disclosures	May 1, 2020
Rebuttal expert disclosures	June 5, 2020
Expert discovery cut-off	July 2, 2020
Last day to file summary judgment and Daubert motions	July 16, 2020
Pretrial conference (if warranted after summary judgment)	February 1, 2021 @ 1:30 p.m.
Bench Trial	March 1, 2021 @ 9:00 a.m.

The parties have agreed to engage in meaningful settlement discussions to begin with an inperson meeting on March 9, 2020. To allow the parties to engage in meaningful settlement discussions while conserving resources, the parties respectfully request an extension of certain discovery deadlines.

Accordingly, the parties have agreed to propose the following pretrial and trial schedule for the Court's consideration and approval:

PROPOSED REVISED SCHEDULE

Event	Deadline
Fact discovery cut-off	June 3, 2020
Expert disclosures	June 15, 2020
Rebuttal expert disclosures	July 15, 2020
Expert discovery cut-off	August 2, 2020 August 3, 2020
Last day to file summary judgment and Daubert motions	August 16, 2020 August 17, 2020
Pretrial conference (if warranted after summary judgment)	February 1, 2021 @ 1:30 p.m.
Bench Trial	March 1, 2021 @ 9:00 a.m.

1 2 3 4	Pursuant to Local Rule 7-11 (providing for administrative motions) and 7-12 (prescribing form of stipulations and proposed orders), the parties respectfully ask the Court to approve the proposed revised schedule.
5 6	Respectfully Submitted
7	Dated: March 3, 2020 PALMER KAZANJIAN WOHL HODSON LLP
8	By: Larry M. Kazanjian
10	Attorneys for Defendants Northern California Tile and Stone, Inc. and Roger Leasure
11 12	
13	Dated: March 3, 2020 FISHER & PHILLUP LLP
14 15	By: Alden J. Marker
16	Attorneys for Defendant Selena Leasure
17 18	Dated: March 3, 2020 McCRACKEN, STEMERMAN & HOLSBERRY
19	Sivally L
20	By: John. J. Davis, Jr. Sarah Grossman-Swenson
22	Attorneys for Plaintiffs
23 24	ORDER TES DISTRICT
25	Pursuant to stipulation, IT IS SO ORDERED.
26 27	Dated:
PALMER KAZANJIAN WOHL HODSON LLP 2277 Fair Oaks Blvd, Saite 455 Sacamerio, CA 95825 916.442.3552	STIPULATION AND JOINT ADMINISTRATIVE MOTION FOR [proposed] ORDER REVISING PRETRIAL SCHEDULE 3.